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February 12, 1993

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: MM Docket 92-265

Dear Ms. Searcy:

Pursuant to Section 1.1206(a)(1) of the Commission's Rules & Regulations, transmitted herewith, in duplicate, for association with the Commission's public record in MM Docket No.92-265, is a copy of a letter dated March 11, 1993 from Hubbard Broadcasting.

RECEIVED

MAR 12 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY



Hubbard Broadcasting, Inc.

3415 UNIVERSITY AVENUE • SAINT PAUL, MINNESOTA 55114

STANLEY S. HUBBARD
President and Chief Executive Officer

March 11, 1993

Mr. Roy Stewart
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

Dear Roy:

Thank you for returning my call. I hope this letter will clarify what I said to you today in regard to national cable programmers providing or not providing for public review the terms of their contracts with cable companies. I told you in the case of MMDS that I did not believe any such requirement is needed for the following reasons:

- Cable companies are monopolies, and they therefore are able to buy programming for prices lower than would otherwise be the case.
- A local competitor to cable need only check a cable system's pricing for a given program to determine whether or not the price that they are being asked to pay to a national cable programmer for such programming is reasonable.
- Because of the ability to check and because of the fact that cable operators get low prices because they are a monopoly, this means systems such as MMDS should have no trouble in working out a fair price structure for themselves in a free and open marketplace.

In regard to our dealings with Viacom, HBO, and other national program services, we have never had a problem in any way which could lead anybody to believe that we had been treated unfairly. In making our Viacom and HBO deals, we competed against a worthy competitor, GM/Hughes DirecTv; and we were able in a free and open marketplace to make a fair deal which will enable us to provide excellent value to consumers.

Once again, thank you. If I can be of any help, please call me.

Best regards,

Stanley S. Hubbard

kso